

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MOHAMED BAHRAOUI

05 CR 10014 WGY
CASE NO.

VIOLATIONS:

18 U.S.C. § 1546(b)(3) --
Fraud and Misuse of Visas,
Permits and Other Documents
18 U.S.C. § 1028(a)(4) --
Possession of False
Identification Document
18 U.S.C. § 911 --
False Representation as
United States Citizen

INDICTMENT

COUNT ONE: (18 U.S.C. § 1546(b)(3) -- Fraud and Misuse of Visas, Permits and Other Documents)

The Grand Jury charges that:

On or about May 9, 2001, at Waltham, in the District of Massachusetts,

MOHAMED BAHRAOUI,

defendant herein, for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United States Code, used a false attestation on INS Form I-9, to wit, that he was a United States citizen, knowing that the said attestation was false, in that he was not a citizen or national of the United States.

All in violation of Title 18, United States Code, Section 1546(b)(3).

COUNT TWO: (18 U.S.C. § 1028(a)(4) - Possession of False Identification Document)

The Grand Jury further charges that:

On or about May 9, 2001, at Waltham, in the District of Massachusetts,

MOHAMED BAHRAOUI,

the defendant herein, did knowingly possess an identification document, other than one issued lawfully for the use of the possessor, and a false identification document, to wit: a counterfeit Social Security card, with intent such document be used to defraud the United States.

All in violation of Title 18, United States Code, Section 1028(a)(4).

COUNT THREE: (18 U.S.C. § 911, False Representation as United States Citizen)

The Grand Jury further charges that:


On February 28, 2003, at Woburn, in the District of Massachusetts,

MOHAMED BAHRAOUI,

defendant herein, falsely and willfully represented himself to be a citizen of the United States.

All in violation of Title 18, United States Code, Section 911.


A TRUE BILL


FOREPERSON OF GRAND JURY


KIMBERLY P. WEST
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS, Boston, January 19, 2005

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk
12:27P

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Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBICity various Related Case Information:

County Middlesex Superseding Ind./ Inf. _____ Case No. _____
 Same Defendant _____ New Defendant _____
 Magistrate Judge Case Number _____
 Search Warrant Case Number _____
 R 20/R 40 from District of _____

Defendant Information:

Defendant Name Mohamed Bahraoui Juvenile ☐ Yes ☒ No

Alias Name _____

Address 21 Thornton Street, Apt. 1, Revere, MABirth date: 1971 SS#: ---- -- 3918 Sex: M Race: Black/N. African Nationality: Moroccan

Defense Counsel if known: _____ Address: _____

Bar Number: _____

U.S. Attorney Information:

AUSA Kim West Bar Number if applicable _____Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date: _____

☒ Already in Federal Custody as detained in INS custody☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 1/19/05 Signature of AUSA: 

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District Court Case Number (To be filled in by deputy) _____

Name of Defendant Mohamed Bahraoui

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. § 1546(b)(3)</u>	<u>fraud and misuse of visas, permits</u>	<u>1</u>
Set 2	<u>18 U.S.C. § 1028(a)(4)</u>	<u>possession of false identification document</u>	<u>2</u>
Set 3	<u>18 U.S.C. § 911</u>	<u>false representation as U.S. citizen</u>	<u>3</u>
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set	_____	_____	_____
Set	_____	_____	_____
Set	_____	_____	_____
Set	_____	_____	_____
Set	_____	_____	_____
Set	_____	_____	_____

ADDITIONAL _____

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District Court Case Number (To be filled in by deputy

Name of Defendant Mohamed Bahraoui

JS45.Bahraoui.wpd - 3/13/02